

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION AT CLEVELAND**

VIRGIL E. BROWN INSURANCE

CASE NO: 1:17-CV-02255

Plaintiff,

JUDGE JAMES S. GWIN

v.

AMERICA'S AUTO AUCTION, INC.

**JOINT STIPULATION OF DISMISSAL
OF PLAINTIFF'S CLAIMS AGAINST
DEFENDANT AMERICA'S AUTO
AUCTION, INC.**

Defendant.

Plaintiff Virgil E. Brown Insurance ("Plaintiff") and Defendant America's Auto Auction, Inc. ("Defendant"), through their respective counsel, hereby stipulate that all individual claims and causes of action of Plaintiff asserted in this action against Defendant are hereby voluntarily dismissed with prejudice, as such parties no longer desire to pursue such claims and seek to dismiss such claims with prejudice to refiling same, and any claims of the putative class members are dismissed without prejudice.

Pursuant to Rule 41 of the Federal Rules of Civil Procedure, all parties desire a Stipulation of Dismissal be entered by this Court, with prejudice, with respect to Plaintiff's individual claims and causes of action asserted herein, but without prejudice to any claims of the putative class members, it being the intent of the parties to fully dismiss each other from these proceedings with the parties bearing their own fees and costs. The parties acknowledge this voluntary dismissal by stipulation is effective upon filing.

WHEREFORE PREMISES CONSIDERED, Plaintiff and Defendant request that a Stipulation of Dismissal with prejudice be entered for all claims of the Plaintiff against Defendant, and without prejudice as to any claims of the putative class members.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on February 2, 2018, a copy of the foregoing was served in accordance with Local Rules upon the following:

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